

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED)	
STATES VIRGIN ISLANDS)	
)	
Plaintiff,)	
)	
V.)	Case Number: 1:22-cv-10904-JSR
)	
JPMORGAN CHASE BANK, N.A.)	
)	
Defendant/Third-Party Plaintiff.)	
)	
-----)	
JPMORGAN CHASE BANK, N.A.)	
)	
Third-Party Plaintiff,)	
)	
V.)	
)	
JAMES EDWARD STALEY)	
)	
Third-Party Defendant.)	
)	

**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS'
NOTICE OF MOTION FOR LEAVE TO AMEND
TO ADD 18 U.S.C. § 1591(d) OBSTRUCTION COUNT**

Pursuant to Rule 15(a) and/or 16(b) of the Federal Rules of Civil Procedure, Plaintiff, the Government of the United States Virgin Islands (“Government”), respectfully moves for an Order granting the Government leave to amend its First Amended Complaint to add a count for violation of 18 U.S.C. § 1591(d), obstruction or attempted obstruction of enforcement of the Trafficking Victims Protection Act. The reasons in support of the Government’s motion are set forth in the Memorandum of Law filed herewith. As directed by the Court during the parties’ March 31, 2023 telephone call with the Court, the Government’s motion and supporting Memorandum of Law are hereby submitted before 5:00 PM on April 3, 2023. Pursuant to further direction provided by the

Court during the same call, Defendant JPMorgan Chase Bank, N.A.'s opposition is due by 5:00 PM on April 4, 2023, and there will be no reply and no oral argument.

Dated: April 3, 2023

**CAROL THOMAS-JACOBS, ESQ.
ACTING ATTORNEY GENERAL**

/s/ Linda Singer

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